

REMARKS**Allowable Subject Matter**

Applicants thank the examiner for indicating that claims 5, 12 and 20 define patentable subject matter and would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Objection to the Specification

In the office action, the specification has been objected to based on use of the term DSYNT. This term is introduced in the specification on page 5, lines 13-22 and an example of a DSYNT tree is provided in Figure 3. As noted in this passage in the specification, the term DSYNT is a recognized term in the art of language processing. The term DSYNT is an abbreviation or acronym which refers to "deep syntactic." For the examiner's reference, two articles using this term are provided in the Supplemental Information Disclosure statement filed herewith. Accordingly, withdrawal of the objection to the specification is respectfully solicited.

Objections to the Claims

Claims 3, 10 and 18 have been objected to for use of the term DSYNT. For the reasons set forth above, applicants respectfully submit that this term is well understood in the art and respectfully request that the objection to claims 3, 10 and 18 be withdrawn.

Claim Rejections - 35 U.S.C. § 112

In the office action, claims 1-22 have been rejected under 35 U.S.C. § 112 as allegedly being indefinite. Applicants respectfully request that this rejection be withdrawn.

The examiner indicates that "the body of the claims does perform what [is] set forth in the preamble" but continues with a request to amend the claims to provide "an interconnection" between the preamble and the body of the claims. As written, the rejection is not understood by applicants. If the examiner intended to say that "the body of the claims does *not* perform what [is] set forth in the preamble," applicants respectfully traverse. The preamble of claim 1 introduces a work piece, i.e., a plurality of documents, on which the claimed method will operate. In addition, the preamble sets forth the purpose of the claimed method, i.e., generating a summary of a plurality of documents. The claimed method steps include, *inter alia*, "extracting phrases...from the plurality of documents" and "performing sentence generation" using the extracted phrases which have been acted on by other method steps. Accordingly, applicants respectfully submit that claims 1-22 satisfy the requirements of 35 U.S.C. § 112, ¶ 2.

Claim Rejections - 35 U.S.C. § 103

Claims 1-4, 6-11, 13-19 and 21-22 have been rejected under 35 U.S.C. § 103 as allegedly being unpatentable over U.S. Patent No. 6,098,034 to Razin et al ("the '034 patent"). Applicants respectfully traverse.

The present claims are directed to systems and methods for generating a summary of multiple, related documents. As set forth in claim 1, the claimed method steps include, *inter alia*, "extracting phrases...from the plurality of documents" and "performing sentence generation" using the extracted phrases which have been acted on by other method steps. Because phrases are extracted from multiple documents, which may be generated at different times, a temporal processing step is performed, such as to sequencing the phrases or eliminating ambiguous temporal references prior to generating a summary.

The '034 patent is not directed to multiple document summarization, does not disclose extracting phrases from multiple documents and does not disclose temporal processing of extracted phrases. Therefore, the '034 patent does not render obvious the currently pending claims.

The '034 patent is directed a method for standardizing phrasing within a single document. The '034 patent discloses analyzing a single user created document to identify standard phrases and then identifies phrases that are similar to, but not identical to the standard phrases. The '034 patent also discloses phrase substitution to insert a standard phrase for one that approximates the standard phrase. Razin et al do not teach or suggest extracting phrases from multiple, related documents as set forth in the pending claims. Further, Razin et al. do not disclose the claimed step of temporal processing. Inasmuch as Razin et al. are dealing with only a single document, there is simply no motivation for Razin et al. to perform the claimed step of temporal processing. In view of the absence of any disclosure regarding the noted claim elements, applicants respectfully submit that

independent claims 1, 8, 16 each define patentable subject matter over the art of record. Claims 2-4, 6, 9-11, 13-15 17-19 and 21-22 depend from these claims are patentable at least for the reasons set forth above.

In view of the foregoing, favorable reconsideration and allowance of claims 1-22 is respectfully solicited.

Respectfully submitted,



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Enclosures